It is an annex to the internal note dated 09.06.2021.

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Prepared by: People and Culture

Approved by: Board of Directors

Our Ethical Principles

Our ethical principles have been written to guide us in all kinds of transactions, behaviors and decisions. In all our ways of doing business and behavior; we comply with our ethical principles and professional behavior rules. Our aim in all our works is to develop the sector and maintain the trust in the sector, as well as to provide social benefit by considering the protection of the environment. While we adapt rapidly to the innovations of the digital world in our works, we do not give up on simplicity and work with a focus on customer satisfaction.

Our Basic Values on which Ethical Principles are Based

	We are honest in our work and behavior; in our dealings with customers, colleagues and other stakeholders.
Honesty	We do not make sales without the express request and approval of our customers, and we obtain their approval in all kinds of transactions.
	Situations that we think will not benefit our customers are stated honestly.
	We know that the basis of leasing is trust and we provide reliable service.
Credibility	We keep our promises regarding our products and services and we maintain our credibility.
	We take the necessary measures to protect the customer assets that we are obliged to retain.
	Our customers are at the center of our works. We consider the benefit of the customers in transactions and we focus on customer satisfaction.
Customer Focus	We offer products and services that meet our customers' financial needs and expectations by knowing and listening to them. We ensure that customer complaints are resolved quickly, and we work proactively to prevent complaints.
	We inform our customers in a timely, accurate and clear manner about the expectations, risks, advantages, disadvantages, costs and benefits of our company's products and services, and obtain their approval in all transactions.
	We make clear, honest and transparent explanations to our customers, avoid technical terms they cannot understand, and do not use misleading statements.
Transparency	We inform our customers clearly, fully, accurately and in a timely manner about the benefits, risks, costs and benefits that our company's products and services will provide.
	We pay attention to ensure that the contents of all agreements, documents and forms presented to our customers are functional and easy to understand.
	Our priority in our services is to contribute to a long-term and sustainable customer relationship.
Sustainable Customer Relationship	We pay attention to balance our short-term and long-term incomes for our customers and stakeholders.
Providing	We implement social contribution practices for sustainable development and social participation.
Social Benefit	We develop social responsibility projects in areas such as culture, art and education.
Considering the Protection	We carry out studies for the efficient use of natural resources and for minimizing the wastes arising from our processes.
of Environment	We comply with environmental laws and regulations.
Impartiality	In all our behavior towards our customers, we do not include any discrimination based on race, gender, belief, religion, ethnicity, nationality, political opinion, age, disability, marital status, sexual orientation.
	We do not engage in any discussion on matters that may involve discrimination.

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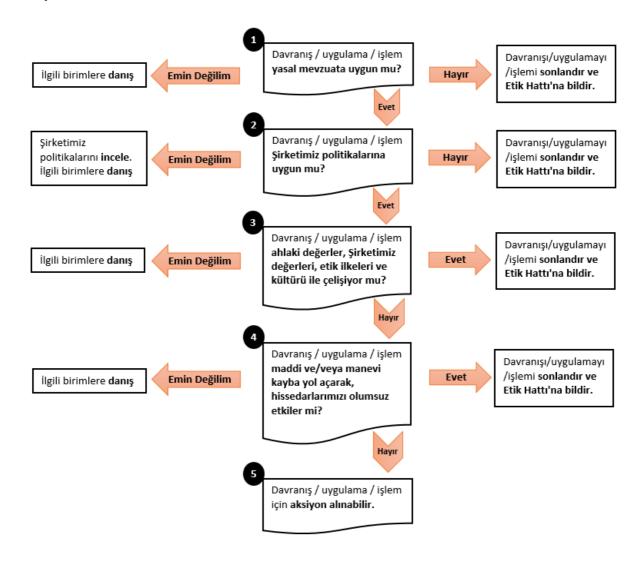
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We know that the rules that we must follow in our behavior and work are not limited to those stated here. In connection with this, we fully comply with the **Law on the Protection of Personal Data** and our **Information Processing Security Principles**.

When we encounter a situation that is not written in our ethical principles and related regulations, we act in accordance with the features on which our principles are based, and we consult the relevant units for any uncertainties.



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We know that we must comply with ethical principles as a whole in order to protect the success and reputation of our company. For this reason, when we encounter a behavior or transaction which is contrary to our ethical principles or we have a suspicious in this respect, we always report the violations to our manager and/or the Ethics Line. We are aware that the notifications made to the Ethics Line are confidential and that we will not face any sanctions due to our notification.



In case of any doubt that any capital market activity carried out in our company does not comply with the Ethical Principles and Code of Conduct of the Capital Markets Union, we inform ickontrol@aklease.com.

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Chapter

1

OUR RESPONSIBILITIES TO CUSTOMERS

Being Honest, Transparent, Impartial and Reliable

- Our customers are at the center of our work, we prioritize customer benefit in customer transactions, leasing solutions and service offers.
- Our priority is to offer applicable services and solutions in line with their financial needs and expectations, and to price these products and services in a fair, transparent and market-friendly manner by knowing our customers and listening them in detail.
- * We inform our customers clearly, fully, accurately and in a timely manner, in line with their rights and obligations regarding our company's leasing solutions and services offered through all sales channels, the factors they should pay attention to, the benefits they will provide, the risks, costs and gains that may arise.
- ❖ We stand clear from all kinds of behaviors and attitudes that may violate the rights of our customers.
- We make clear, honest and transparent statements to our customers. We explain in detail the single or packaged products or services that our customers purchase, avoid technical terms that they cannot understand, and do not use exaggerated and misleading expressions.
- ❖ We honestly indicate the products that we think will not benefit our customers, and we clearly offer the most suitable product and price alternatives that will beneficial to our customers.
- ❖ We do not sell or renew services/products without the express request and approval of our customers, and we obtain their approval in all transactions related to sales.
- We inform our customers clearly, fully and accurately about the content, terms and conditions, benefits and obligations of the campaigns.
- ❖ We do not make unfulfilled promises to customers regarding products and services, we keep our promises and maintain our credibility.

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❖ We take the necessary measures to protect the customer assets that we are responsible for retaining.

- ❖ We know that one of the most important ways for our company to gain an edge over its competitors is to provide quality service to our customers and customer satisfaction forms the basis of our activities.
- ❖ We comply with the rules and principles of our company's premium campaigns to increase sales, we know that manipulative transactions are against our ethical principles and we act in line with this awareness.
- We avoid behaviors that may cause a conflict of interest between us and our customers, and we maintain our impartiality.

We provide equal and impartial service to our customers regardless of race, gender, belief, religion, ethnic origin, nationality, political opinion, age, disability, marital status, sexual orientation, etc. We do not get into any discussion on these issues.

Performing Customer Transactions Legally and Accurately

- ❖ We perform all our transactions accurately and completely, in accordance with the legal and domestic legislation and leasing principles.
- While performing customer transactions, we act within the framework of the determined authorities and limits, and contact the relevant units of our company for transactions that exceed our authority.
- We do not act on behalf of our customers, even by proxy.
- ❖ We do not cause deficiencies in matters such as documents, information, signatures, etc. that should be obtained from our customers; we convey the features and details of the products and services offered in a clear and transparent manner.
- ❖ We know the importance of and we pay attention to entering customer information into the system correctly and completely for customer satisfaction.
- We pay attention to prepare the contents of all agreements, documents and forms presented to our customers in a way that is compatible with the operation and easy to understand.

Working with a Focus on Customer Satisfaction

- ❖ We provide the best service to our customers, and we pay attention to avoid customer dissatisfaction.
- We ensure that our flow and procedures are plain and simple and easily understandable for our customers.

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- ❖ We know that it is essential to ensure customer satisfaction in accordance with the laws, official practices and our company's business principles.
- ❖ In the event that customer transactions and requests are outside of our authorities and responsibilities or are related to areas that we do not have enough information about, we will transfer the issue to other authorized persons or units.
- ❖ We try to ensure that customer complaints are resolved as quickly as possible and take the necessary measures to prevent their recurrence.
- ❖ We evaluate the feedbacks of our customers as soon as possible and respond in the fastest and most explanatory way. We see the customer feedback as one of the most important inputs of our continuous improvement.
- While provide the demands and requests of our customers, we help them to know and use their legal rights.
- ❖ We develop and diversify our products and services to offer our customers the latest innovations brought by technology in the most effective way.
- ❖ We evaluate the effects of our approaches and practices on customers and markets, and work to eliminate possible risks and to highlight the benefits of our customers.
- ❖ We constantly review our products and services and make continuous updates in areas that will benefit our customers.
- ❖ We provide training and development opportunities to ensure that our employees provide the best service, and ensure that they have the highest ethical and professional standards.

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Chapter

2

OUR RESPONSIBILITIES TO THE SECTOR AND OUR EMPLOYEES

Showing Attitudes and Behaviors Appropriate for the Leasing

Sector

- ❖ We know the importance of complying with moral and professional principles in all our work and behavior, and we aim to adopt these values in the company.
- ❖ We direct the demands of our potential or current customers to our company, and we ensure that our company takes advantage of business opportunities that are legal and compatible with our policies and that will provide added value.
- ❖ We are aware that the leasing sector and capital markets are in constant change and development, and we strive to keep our knowledge and skills up to date and improve them accordingly.
- ❖ We use all kinds of company resources, tools and fixtures related to our work effectively, efficiently and economically; we know that they will only be used for business purposes and we do not use them for our private matters.
- ❖ In addition to our business life, we represent the company in the best way in our private life, and we avoid attitudes and behaviors that may damage the reputation and image of the company.
- ❖ In all our correspondence, we act in accordance with the general rules of courtesy, the requirements of professional business life, social norms and our ethical principles.
- ❖ We dress in accordance with the prestige of the leasing industry and pay attention to our personal care.
- We adopt a professional attitude within the scope of courtesy and respect in our relations with third parties such as customers and suppliers.
- ❖ We stay away from all kinds of illegal activities, and we do not attempt gambling and betting games that do not propriate for a leasing sector employee.

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❖ We are aware that it is forbidden for us to use or be under the influence of narcotic substances and illegal drugs while performing our duties at the workplace or while working.

- ❖ We do not come to work under the influence of alcohol and we do not drink alcohol during working hours.
- ❖ If we are subject to a legal process or sanction for any reason, we will inform our manager.
- ❖ We pay attention to the proportionality of our expenditures with our income, we do not enter and not allow our relatives to enter into debt-credit relations with our colleagues, customers, suppliers and other stakeholders.
- ❖ We know that the information we convey to our company within the scope of the Law on the Protection of Personal Data must be accurate and up-to-date.

Understanding the Importance of Teamwork

- ❖ We know that we work much more efficiently when synergy is provided within the team, and we avoid behaviors that will harm our teamwork. We empathize with each other and act within the scope of courtesy and respect.
- ❖ We know that all units of our company are a whole, we do not create competition between branches regarding the customers.
- ❖ We know that sharing our experiences in our areas of expertise areas with other company employees will improve our company.
- We support the professional development of employees who are less experienced than ourselves and our newly recruited colleagues.
- ❖ We do not make any of our colleagues do our personal work in a way that is inconsistent with their duties, authorities and responsibilities.
- ❖ We keep our common used working and living areas clean and tidy, and we pay attention to not to disturb our colleagues.
- ❖ We know that our employees are equal regardless of race, gender, belief, religion, ethnicity, political opinion, age, disability, etc. We do not allow our colleagues to be subjected to discrimination and harassment.
- We know that career advancement in our company is based on talent and performance, and we act accordingly.

We do not cause emotional harassment in the workplace.

Compliance With Working Hours

We pay due attention to compliance with working hours.

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❖ We know that there is no difference between fulfilling the responsibilities of the employee at the workplace and working remotely, and also there is no difference in terms of daily working hours and resting hours.

- ❖ When we have to leave the workplace or where we work remotely during working hours, we inform the people we work with and get permission from our managers.
- ❖ In situations that require overtime, we give maximum effort to observe the rights of the employees and to ensure that they use their regular annual leave.

Ensuring Safety and Business Continuity in the Workplace

- ❖ As employees, we take due care to comply with all health and safety policies in order to ensure safety at work and where we work remotely.
- ❖ We abide by all the provisions in the text titled "Issues to be Considered in Terms of Occupational Health and Safety in Remote Working" within the scope of "Aklease Remote Working Information".
- ❖ We know our **Business Continuity Procedures** responsibilities and apply them when deemed necessary, in order to continue to respond to market and customer needs and to ensure business continuity in case of fire, natural disaster, crisis or emergency that may interrupt this continuity.

Regulating Our Relationships with Professional Organizations and Other Competitor Companies

- We exchange accurate, complete and understandable information with professional organizations within the framework of legislation and company principles, provided that we do not violate customer and company secrets and competition rules.
- While fulfilling our duties, we do not express positive or negative views on competitor companies and their services, and we stay away from positive or negative expressions, comments and shares in all kinds of media, including social media and the internet.
- We know that it is unacceptable to intervene in free markets and the prices of products and vehicles in these markets or to try to disrupt the competitive environment in these markets.
- In our duties and works; we act in accordance with the protection of trust in the leasing sector, the development of the sector and the country's economy, and we avoid actions that may cause unfair competition.
- In our announcements and advertisements, we act honestly and realistically in accordance with legal regulations and general morality, we do not include expressions and phrases that disparage other

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companies or their products and services, and we avoid any action that may damage our professional credibility and reputation.

❖ We avoid all kinds of practices that may lead to unfair competition regarding employment.

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Chapter

OUR RESPONSIBILITIES TO THE COMPANY

Protecting Customer Information

- ❖ We know that customer and company information is the most important asset of our company, we aware of the necessity of legal and internal regulations and the fact that their violation requires sanctions and act accordingly.
- ❖ We know that we are obliged to protect all kinds of company and customer information from third parties during the Remote Working period and to take all necessary precautions, and that the company's obligations regarding information security also apply to remote working.
- ❖ We act sensitively to ensure information security in both real and digital environments and fully comply with the relevant regulations.
- ❖ We do not misuse the financial and personal customer information we have due to our work, and we do not share them with unauthorized persons.
- ❖ We are aware of our responsibilities regarding the confidentiality of customer information and we ensure the security of this information, and we do not share it except for persons and institutions authorized by law.
- ❖ We do not transfer the data containing customer information out of the company for any purpose and in any way, by transferring it to a personal e-mail address for various purposes or by other means such as USB, CD or cloud technology.
- ❖ We do not leave customer data (password, card number, mobile phone number, mother's maiden name, etc.) and documents containing these data in unsafe environments, and we do not transmit them even to the customers themselves via the internet, e-mail or any other unsafe way.
- We do not transfer the personal and financial information of customers out of the company for any reason.

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❖ We obtain the approval and consent of the customers whose personal data are obtained through digital or physical channels, and inform the customers in a clear and understandable manner about the collection and processing of data.

❖ In all our practices, we take an approach to ensure the completeness, accuracy and currentness of customer data and to improve data quality.

Protecting Company Information

- ❖ We do not leave the information and documents we have due to our job in unsafe environments, including remote working processes, and we do not share them with unauthorized persons and authorities inside or outside the company for any reason, through written, verbal or electronic means.
- ❖ We know that the projects, technical infrastructure, regulations, etc. that we have developed due to our work are the property of the company, and we never transfer these and similar works out of the company while we are working or leaving the company.
- We do not cause any speculation or situations that may lead to negative evaluations regarding our work.
- ❖ We do not transfer the information, documents or correspondence that is a company secret or a trade secret out of the company for any reason, and we do not share it with third parties other than those authorized by law.
- ❖ We do not give screenshots, forms, agreements and other documents related to our company's applications to anyone other than customers or other employees.
- ❖ We do not share our personal rights, which is personal, with other people inside or outside the company.
- We know the importance of digital security principles in our relationships with third parties and act accordingly.

Protecting Stakeholder Information

- ❖ We attach importance to the confidentiality of personal data and working information of our employees, and take the necessary measures to prevent unauthorized accession to this information.
- ❖ We know that information about our suppliers, projects and business partners, and other stakeholders is private and confidential, and we do not share this information with unauthorized persons.
- We sign confidentiality agreements with third parties to whom confidential information and customer data are shared with, for the protection and confidentiality of data, and we comply with the provisions of this agreement.

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Complying With Laws and Regulations

- ❖ We know that leasing is a sector subject to laws and regulations, and that we must fully comply with all laws and rules we are dealing with.
- ❖ We are aware of our legal obligations and social responsibility in combating money laundering, financing of terrorism, drug and gambling initiatives and other financial crimes, in accordance with our Corporate Policy on the Prevention of Laundering of Crime Revenues and Financing of Terrorism.
- ❖ In case it is determined that the transactions requested and intended to be carried out before our company are of a nature that raises suspicion regarding money laundering, we will immediately notify our company's Compliance Unit (<u>uyum@aklease.com</u>) with due confidentiality.
- ❖ We do not compromise our responsibilities due to any customer relationship and we act in accordance with our procedures.
- ❖ We know that the records and information owned, collected, used, managed by our company must be accurate and complete, and that we are responsible for the integrity and storage of the information, reports and records under our control.
- We act in accordance with the principles of honesty, accountability and transparency in our relations with official authorities, and we pay attention to transmit the information, documents and records requested for control and audit purposes in accordance with the legislation accurately, completely and in a timely manner.

Developing Risk Perception and Avoiding Risks

- ❖ We are aware that one of the most important elements of the leasing sector is effective risk management. We evaluate the possible consequences of our transactions and the risks we assume. We pay attention to ensure that our activities comply with the company's general risk policies and risk management principles.
- ❖ We know that the establishment and operation of an effective internal control system for the management of risks is among our primary responsibilities, we carry out the control activities we are responsible for effectively and we do not cause any control weakness.
- ❖ We support the healthy continuation of the internal and external audit activities operating in the branch, unit or department in which we are working, and act cooperatively.
- We are sensitive about not accessing websites that may include a risk in terms of information security of the company.

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❖ We know that the passwords used in our company's applications are within the scope of personal data and confidential; we do not share them with anyone, including our colleagues, and we do not keep them in written form to avoid its hand-over to other parties.

- ❖ When using computers, software and hardware; we consider the interests of the company, we do not install licensed or unlicensed programs on computers, we do not use or copy programs without our authorization.
- ❖ We use Internet access, e-mail addresses, applications such as communicator allocated to our use within the framework of the determined information security policies and for professional purposes.
- ❖ We do not share any confidential and sensitive information in conversations and correspondence between the company and the customer.
- ❖ We keep our desks and remote workspaces clean to protect information appropriately.

Avoiding Insider Trading

- ❖ We know that the use of information that has not yet been disclosed to the public, which may affect the value of capital market instruments, for the purpose of gaining benefits for ourselves or third parties, and thus disrupting the equality of opportunity (insider trading) is against legal regulations.
- ❖ We pay special attention to the issue of insider trading and act in accordance with the legal and rules determined by our company while our company invests in stocks and investment instruments of customers, suppliers or parties whose financial situation we have information about due to our position,

Taking Care of Business Expanditures

- ❖ In all kinds of expanditures related to the company, we always consider the benefit of the company and comply with the cost-benefit and savings principles.
- ❖ We declare our expanditures due to different assignments accurately and on time, within the principles of our company.

Regulating Our Personal Investments and Financial Transactions

- ❖ We avoid banking transactions such as guarantee, joint account opening with customers, suppliers and other stakeholders.
- While performing our personal banking transactions, we pay attention not to disrupt our working hours and the services we offer to our customers.

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❖ We do not personally realize the products and services for which we are the decision maker in pricing and approval, in favor of ourselves and our first-degree relatives and we do not allow the price of products and services offered to differ from the price charged to customers.

- ❖ We pay attention to investments that are medium and long-term, we avoid speculative and high risky investments, and we perform our derivative transactions in accordance with the legislation.
- ❖ We do not act on behalf of others, including our 1st degree relatives, before our company.

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OUR RESPONSIBILITES TO SOCIETY

Internalizing Human Rights

- Everyone, as stated in the United Nations Universal Declaration of Human Rights, the European Convention on Human Rights and our Constitution, has basic human rights such as the right to live, be free, be safe, be free from torture and ill-treatment, equal and free trial, privacy, reside and travel, own property, think and express thoughts, participate in public administration by universal and equal suffrage, qual access to public services, work under fair and equal conditions, rest and paid leave, social security, fair and equal education, participate in and benefit from scientific, artistic and cultural activities, religion and conscience.
- ❖ We do not accept the involvement of our stakeholders in forced labor practices and child employment.

Providing Social Benefit

❖ In line with the principle of sustainable development and social participation, we implement social contribution practices in line with the needs and demands of the physical and social environment we live in, and develop social responsibility projects in areas such as culture, art and education.

Ensuring the Protection of the Environment

- ❖ We carry out studies for the efficient use of natural resources and for minimizing the waste arising from our processes to the lowest possible level.
- ❖ We fully comply with environmental laws and regulations. We encourage the development of sensitivity on this issue among our stakeholders. We request the businesses we work with to take the necessary measures in this regard.
- ❖ We work to support recycling and reclamation activities for our employees and stakeholders to raise awareness on this issue.

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• We support transparency policies through international collaborations to reduce greenhouse gas emissions and protect biodiversity.

❖ In the selection of products and services received from suppliers, we prefer suppliers that operate more sensitive to society and the environment and that work with production systems.

Decent Society, Anti-Bribery and Anti-Corruption

- ❖ We clearly state in our relations with the relevant institutions that all forms of bribery and corruption are unacceptable by our Company.
- ❖ We know that our responsibility in the fight against bribery and corruption is to comply with the antibribery and anti-corruption laws and regulations, ethical and professional principles and universal rules applicable in all countries where we operate, and we show due care in this regard.
- We know that the fight against bribery and corruption includes; all company employees, including the Board of Directors, companies and employees from whom we receive outsourcing services, including support services regulated by legislation, suppliers, consultants, lawyers, persons and otganizations working on behalf of the company, including external auditors.
- ❖ In line with the goal of a decent society, we have a careful, determined and uncompromising understanding of these initiatives.

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Chapter

Our Business Relationships

What is Conflict of Interest?

Employees are required to avoid all kinds of transactions and relationships that may harm the employer for their personal benefits. In case of breach of this trust-based relationship, a conflict of interest may arise. A conflict of interest is when the personal interest of the employee does not comply with the interests of the company and the customer, or there is a perception in this regard. For this reason, we evaluate the possibility that our every transaction and behavior will be perceived by others as a conflict of interest, and if it is perceived, whether both we and our company will be in a difficult situation, whether it will affect our impartiality, and if not whether it will be perceived in this way and whether it will negatively affect our company, our customers, suppliers and other stakeholders.

Organizing Our Non-Business Activities

- ❖ We do not take part in any commercial, industrial or other activities outside the company and we allocate all our time and work to the company.
- ❖ We know that it is only possible to take part in the group companies of the company or in any institution other than the company, only with the decision, instruction and approval of the Company's Board of Directors.
- ❖ We do not act as experts in any way, using our professional knowledge and titles, without obtaining permission from the company's senior management.
- We do not enter into a competition against our company by taking advantage of a corporate opportunity that arises while representing our company.

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Arranging Our Business Relations with the Parties

- ❖ We participate workshops, conferences, panels, trainings, seminars, fairs or invitations and organizations with similar name and scope; which are organized, sponsored, or offered to cover all or part of participation, travel or accommodation expenses by companies or organizations that provide goods or services only if the expenses are covered by the company or by paying our personal expenses ourselves and documenting this. In the approvals to be obtained for such visits abroad, we also provide information about the participation expenses needed in this context.
- ❖ We avoid behavior such as exchanging goods or services for benefit purposes other than the ordinary customer relationship, providing work and employment to their relatives, from persons or organizations that have a business relationship with the Company.
- ❖ We take the necessary measures to prevent any supplier or customer from affecting the purchasing decisions in our company. With the awareness that purchasing is a sensitive process, we prevent real or perceived conflicts of interest that may arise.
- We do not enter into partnerships that may deemed as a conflict of interest with customers.
- While fulfilling our responsibilities, we do not accept the offers made to provide benefits to ourselves or our relatives, and we will forward the situation to our internal authorities and managers.

Organizing Our Personal Business Relationships

- ❖ We do not buy any movable and immovable property that is disposed of by the company or belonging to the followed companies, personally or on behalf of our relatives.
- We prefer our relatives to receive services from our company, but we do not demand any favors or privileged practices.
- If the business processes in which we are in a decision-making position (eg loan allocation, recruitment, etc.) may result in providing benefits to our relatives, we do not take part in the processes to be applied for these people.

Paying Attention to Gift Acceptance

❖ We do not accept gifts from our customers, suppliers and other persons and institutions other than symbolic gifts of low material value. In particular, we do not receive any gifts that appear to make us compromise on business decisions.

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Political Activities, Non-Governmental Organizations and

Financial Contributions

- ❖ We do not take an active part in any political party and affiliated organizations, and we avoid any behavior that may deemed as a financial support to them.
- ❖ We may work in professional organizations such as the Chamber of Commerce, Stock Exchange and non-profit associations, foundations, cooperatives, etc., but we do not use the company's name, opportunities and our duties in the company in any way during these duties.
- We never request donations or similar requests from customers or other employees, even on behalf of associations or various organizations.
- ❖ We know that the permission of the competent authorities should be obtained for aids and donations to be made on behalf of the company.
- We make sure that our personal donations to charities are confidential, voluntary and not associated with our business.

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Our Relationship with the Media and External Institutions

Protecting the Value of the Aklease Brand

- ❖ We know that the "Aklease" brand is one of the most valuable assets of our company.
- ❖ We know the rules and practices regarding the use of the "Aklease" brand and all other brands belonging to our company, and as a general rule, we do not use our company's name, logo, and trademark outside of our work.
- ❖ We do not cause loss of reputation of our company and "Aklease" brand with our working style and behavior.
- Our priority in our services is to maintain the transparent, reliable, fair and customer-benefit-oriented services we provide to our customers and to the communication we establish with our customers.

Paying Attention to Our Written, Visual and Social Media

Contents

- We respond to information or interview requests from the press, TV and other media organizations about our job in the company, after we get permission from the authorized units or persons of the company.
- ❖ We respect the name "Aklease" in our social media usages and we do not engage in acts that humiliate or discredit our company, customers, stakeholders, competitors and other financial institutions.
- ❖ We protect our equal and impartial identities, regardless of race, gender, belief, religion, ethnicity origin, nationality, political opinion, age, disability, marital status, sexual orientation, and avoid from discussions on these issues on social media.

Effective Date: 22 August 2013

Prepared by: People and Culture

Approved by: Board of Directors

It is an annex to the internal note dated 09.06.2021.

- ❖ We do not share information about markets and economic developments by using our company's name in social media that may direct or influence internet users.
- ❖ We act in accordance with general courtesy rules, social norms, human, animal and environmental rights, basic values of democracy and ethical principles in the use of social media,
- ❖ We pay attention to the confidentiality of personal data of customers and avoid from sharing written and visual content that may violate them.
- ❖ We act in accordance with regulations such as copyrights, trade secrets, fair use and competition rules, and we do not share any illegal or criminal content.
- We do not criticize company policies and practices through social media and we do not share negative contents about the requirements of the job, the working environment and our teammates.
- ❖ We do not make any direct or indirect statements containing political views on social media.
- ❖ We pay attention to not to provide any information about our company while blogging and we do not subject Aklease and its sub-brands to articles and/or comments.

Paying Attention to Our Relations with External Institutions and Individuals

- ❖ We do not express any opinion on behalf of our company, and do not share confidential information about the company, without the knowledge and permission of the authorized unit, in organizations such as conferences, panels, seminars, etc., which we attend due to our responsibility in our company or for educational purposes.
- ❖ We do not share confidential information about our company in trainings, courses, conferences, seminars, panels, other organizations we attend outside of working hours, and we do not allow our own ideas and opinions to be perceived as belonging to our company in our meetings and conversations.